

BNL Groundwater Protection Group  
*Petition for Closure for OU I South Boundary Groundwater Treatment System*

Comment Number	Section	Comment	Response
<b>Email from Sharon Hartzell, USEPA, to Bob Howe, BSA September 25, 2019.</b>			
1	NA	One observation is that although the Current Landfill has been capped, well 088-109 still sometimes contains total VOCs of about 100 ug/L, which is relatively high. This well was not discussed in the text. Are there any reasons that this well has fluctuations in concentrations? Is there still some leakage from the source area to the groundwater?	This well is part of the Current Landfill Monitoring program that will continue. The concentration fluctuations observed in this well are likely due to water table fluctuations under the landfill. These concentrations are expected to attenuate to below MCLs before they reach the site boundary as per our groundwater modeling. Downgradient well 098-99 (this well is mentioned on page 5, 5 <sup>th</sup> paragraph) was installed approximately 1,200 feet downgradient of this well to help confirm this.
<b>Letter from Brian Jankauskas, NYSDEC, to Robert Gordon, DOE August 19, 2019.</b>			
The Departments agree that the system has met the system closure criteria. The Departments do have some minor comments to be considered for the final document, see attached.			
1	Section 1.2, fifth sentence	Suggest changing "where documented in the OU I ROD which" to "were documented in the OU I ROD which."	Revision made and revised page 1 is attached.
2	Section 2.2.2, first paragraph, fifth sentence	Revise sentence for clarity as identifies eleven monitoring wells.	Revision made to Section 2.2.2 and 4.0, and revised page 5 and 8 are attached.
3	Figure 4	Suggest including the trends for monitoring well 115-16, which had a detection of 9.21 ppb near the property boundary.	The 9.21 ppb was total VOCs. The individual VOC concentrations are less than the applicable MCLs. The TVOC concentration is comprised primarily of 1,1-Dichloroethane (4.3 ppb) and Chloroethane (4.5 ppb).